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217/782-6761

Refer to: L1630200005 -- St. Clair County  
Sauget/Sauget Sites  
Superfund/General Correspondence

December 18, 1986

Warren Smull  
General Superintendent of Environmental Affairs  
Monsanto Chemical Company  
500 Monsanto Avenue  
Sauget, Illinois 62206-1198

Dear Mr. Smull:

The Illinois Environmental Protection Agency has completed its review of the Geraghty and Miller Ground Water Study for Monsanto in Sauget, Illinois.

The Geraghty and Miller Ground Water Study represented a reasonably good effort in determining the hydrogeological conditions occurring in the Sauget area.

The Agency feels that the study's conclusion for capping the Krummrich drum site is unacceptable. In addition the study's evaluated alternative does not meet the requirements of the Illinois Environmental Protection Act or CERCLA Reauthorization, which require permanent solutions and alternatives to land disposal.

In January 1987, IEPA will schedule a meeting with representatives of USEPA and Monsanto to discuss applicable remedial technologies.

The basic premise of the G & M report is that the pollutants released from Monsanto property become diluted and cause no significant impact to the environment. Evidence shows the contrary, fish from the Mississippi River have been found to contain the same chemical constituents in their flesh as that released from Monsanto properties.



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IEPA feels that locating and eliminating the sources of these pollutants is the surest means of remedial action and is consistent with the intent of the recently amended Superfund Program. We would hope that Monsanto accepts IEPA'S opinion and seriously examines other remedial alternatives or combinations of alternatives in the pursuit of final remediation of the problem elements associated with the Krummrich Plant and Drum site.

Respectfully,

A handwritten signature in cursive script that reads "William C. Child".

William C. Child, Manager  
Division of Land Pollution Control

WCC:JL:bjh/1007g/9

cc: Bill Constantelos, USEPA ✓  
Bob Cowles  
Jeff Larson  
Glenn Savage  
Ken Mensing  
Monte Nienkerk  
Rob Watson  
Geordie Smith  
Connie Sullinger  
Tom Hornshaw